

REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-26 in the application. In response to an election requirement, the Applicants provisionally selected Claims 1-7 without traverse and withdrew Claims 8-26. In previous responses, the Applicants amended Claims 1-3 and canceled dependent Claim 3 without prejudice or disclaimer. In the present response, the Applicants have not amended, canceled or added any claims. Accordingly, Claims 1-2 and 4-7 are currently pending in the application.

I. Rejection of Claims 1 and 7 under 35 U.S.C. §102

The Examiner has rejected Claims 1 and 7 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,124,716 to Kanamori. The Applicant respectfully disagrees.

Kanamori discloses a test unit connector 20 including a body 34 from which a plurality of terminal pins 36 extend. The terminal pins 36 are electrically connected to wires 38 extending to a test unit 26. (*See* column 3, lines 33-35.) The Examiner asserts the body 34, the wires 38 and the test unit 26 equate to the centralized connector module as recited in Claim 1. (*See* Examiner's Action, page 2 and pages 5-6.) The body 34, wires 38 and test unit 26, however, is not a "self contained assembly of electronic components installed as a unit." (*See* Examiner's Action, page 6, referring to The American Heritage Dictionary.) On the contrary, the body 34 and wires 38 are electronic components that are connected to the test unit 26 when performing the particular function of testing. (*See* column 3, lines 5-8.) The body 34, wires 38 and test unit 26 are not a "self contained assembly" that is "installed as a unit" but instead, are units that are assembled together when testing

a device and then disconnected from the device after testing. (See column 3, line 55, to column 4, line 23, and Figure 1.)

Additionally, the Applicant fails to see how insulation on the wires 38, along with the body 34 and test unit 26, can be equated as a single dielectric body as asserted by the Examiner. (See Examiner's Action, page 2.) As defined in the Fourth Edition of "The American Heritage Dictionary," a body is a mass of matter that is distinct from other masses. Thus, even assuming that the insulation of the wires 38 is a dielectric body, the connected body 34, wires 38 and test unit 26 form three distinct masses of matter.

Furthermore, assuming *arguendo* that Kanamori discloses a dielectric body, Kanamori does not disclose a dielectric body having interconnected terminal sets corresponding to components connectable thereacross and configured to provide terminating points for the components for continuous operation thereof as recited in Claim 1. The Examiner asserts the plurality of terminal pins 36 that extend from the body 34 connect to the electrical junction box 10 and are terminating points. (See Examiner's Action, pages 2-3.) The terminal pins 36, however, are connected to junction block 10 "(w)hen it is desired to test the circuits of electrical devices 24." (See column 3, lines 55-65.) "When the test procedure is terminated, test unit connector 20 is disconnected from test port 16" (See column 4, lines 19-20.) Thus, the terminal pins 36 are connected to the junction block 10 during testing. For operating the electrical devices 24, the wiring harness connector 18 is connected to the junction box 10. (See column 3, lines 9-12, lines 48-54, and column 2, lines 3-7.) Thus, even though the terminal pins 36 of the test connector unit 20 may provide access to the junction box 10 during normal operation, the terminal pins 36 do not provide terminating points for components for continuous operation.

Thus, for at least the above reasons, Kanamori does not teach each and every element of independent Claim 1. Kanamori, therefore does not anticipate Claim 1 and Claims dependent thereon. Accordingly, the Applicants respectfully request the Examiner to withdraw the §102 rejection with respect to Claims 1 and 7 and allow issuance thereof.

II. Rejection of Claims 2, 4 and 6 under 35 U.S.C. §103

The Examiner previously rejected Claims 2, 4 and 6 under 35 U.S.C. §103(a) as being unpatentable over Kanamori in view of U.S. Patent No. 3,728,616 to Cheek, *et al.* The Applicant respectfully disagrees.

As discussed above, Kanamori does not teach a centralized connector module as recited in amended independent Claim 1. Additionally, Kanamori does not suggest each element of independent Claim 1 since Kanamori is directed to a test unit 26 that can be connected to and then used to check an electrical device “without requiring that the device be removed from *its operative connection* with the junction block and re-connected to a circuit test unit.” (*See* column 1, lines 58-63. Emphasis added.) Accordingly, Kanamori does not teach or suggest each element of independent Claim 1.

Cheek has not been cited to cure the deficiencies of Kanamori but to teach the subject matter of dependent Claims 2, 4 and 6. (*See* Examiner's Action, pages 3-4.) Additionally, Cheek does not cure the deficiencies of Kanamori since Cheek teaches an apparatus for testing the continuity and erroneous connections of a plurality of wired connections. (*See* column 1, lines 30-32.) Thus, instead of disclosing a central connector module, Cheek teaches a separate device that is used to check continuity of circuits. Cheek, therefore, does not cure the deficiencies of Kanamori.

As such, the cited combination of Kanamori and Cheek does not provide a *prima facie* case of obviousness of independent Claim 1 and Claims 2, 4 and 6 which depend thereon. The cited combination, therefore, does not render obvious Claims 2, 4 and 6. Accordingly, the Applicants respectfully request the Examiner to withdraw §103(a) rejection of Claims 2, 4 and 6 and allow issuance thereof.

III. Rejection of Claim 5 under 35 U.S.C. §103

The Examiner rejected Claim 5 under 35 U.S.C. §103(a) as being unpatentable over Kanamori in view of U.S. Patent No. 6,124,716 to Collier, *et al.* The Applicant respectfully disagrees.

As discussed above, Kanamori does not teach or suggest a centralized connector module as recited in amended independent Claim 1. Collier discloses an electrical testing device for determining the continuity between ground terminals of an electrical power cord and determining the electrical grounding of an electrical power tool. (*See* Abstract.) Collier has not been cited to cure the deficiencies of Kanamori but to teach the subject matter of dependent Claim 5. (*See*

Examiner's Action, pages 4-5.) As such, the cited combination of Kanamori and Collier does not provide a *prima facie* case of obviousness of amended independent Claim 1 and Claim 5 which depends thereon. Accordingly, the Applicants respectfully request the Examiner to withdraw the §103(a) rejection of Claim 5 and allow issuance thereof.


IV. Conclusion

In view of the foregoing remarks, the Applicant now sees all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicits a Notice of Allowance for Claims 1-2 and 4-7.

The Applicant requests the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

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Dated: August 9, 2007

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